

INTERNET  
FORM NLRB-501  
(2-08)UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

FORM EXEMPT UNDER 44 U.S.C 3512

## DO NOT WRITE IN THIS SPACE

Case 08-CA-212483	Date Filed 1-4-18
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## INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Midwest Terminals of Toledo International, Inc.		b. Tel. No. (419) 698-8171
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 383 West Dussel Drive Maumee, Ohio 43537	e. Employer Representative Fred Deichert	g. e-Mail fred@midwestterminals.com
		h. Number of workers employed Approximately 50
i. Type of Establishment (factory, mine, wholesaler, etc.) Dock	j. Identify principal product or service Transportation	

k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Today, based solely on signatures on a decertification petition, the Employer has allegedly unilaterally withdrawn recognition of the Union, even though the Employer has engaged in unfair labor practices to undercut union support (see attached). By these acts and conduct, the Employer, by and through its officers, agents, and representatives has interfered with, restrained, and coerced, and is interfering with, restraining, and coercing its employees in the exercise of their rights to self-organization, to bargain collectively through representatives of their own choosing, and to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection, or to refrain from any or all such activities, which rights are guaranteed in Section 7 of the Act, in violation of Sections 8(a)(1) and/or 8(a)(5). As such violations pose a real danger of creating industrial unrest and/or of undermining employee support for the union, International Longshoremen's Association, Local 1982 requests relief under Section 10(j) of the Act.

## 3. Full name of party filing charge (if labor organization, give full name, including local name and number)

International Longshoremen's Association, Local 1982

## 4a. Address (Street and number, city, state, and ZIP code)

2300 Ashland Avenue, Suite 225  
Toledo, OH 43620

4b. Tel. No. (216) 210-2798

4c. Cell No. (216) 210-2798

4d. Fax No. (989) 423-0036


4e. e-Mail  
acdvp@weyockey.com

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

International Longshoremen's Association

## 6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

By   
(signature of representative or person making charge)

Matthew T. Hurm, Esq.

(Print/type name and title or office, if any)

Tel. No. (216) 781-3600

Office, if any, Cell No.

Fax No. (216) 781-8839

e-Mail  
hurm@fhplaw.comAddress 20445 Emerald Parkway Dr., Suite 210, Cleveland, OH 44135 01/03/2018  
(date)

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

## PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

Applicant Exhibit E